

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KYLE JIGGETTS,)
)
)
Plaintiff,)
)
)
v.)
)
ALLIED BARTON SECURITY)
SERVICES, NEW YORK CITY)
DEPARTMENT OF)
TRANSPORTATION)
)
Defendants.)
)

NOTICE OF MOTION

**CIVIL ACTION NO.
08-CV-4371-(JSR/RES)**

PLEASE TAKE NOTICE, that Defendant AlliedBarton Security Services LLC (“AlliedBarton”), incorrectly identified as Allied Barton Security Services, moves before this Court, before the Hon. Ronald L. Ellis, U.S.M.J., on the 22nd day of September, 2008, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order, pursuant to Rule 12(e) of the Federal Rules of Civil procedure, requiring Plaintiff Kyle Jiggetts (“Plaintiff”) to file a more definite statement with regard to his Amended Complaint filed on June 25, 2008. In the alternative, AlliedBarton requests that this Court dismiss Plaintiff’s Amended Complaint with leave to refile.

Dated: White Plains, New York
August 20, 2008

s/

Steven R. Kramer, Esq. [SRK 2097]

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